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March 15, 2011

## **VIA E-FILING ONLY**

Honorable Michael A. Shipp, U.S.M.J. Martin Luther King, Jr. Federal Building & U.S. Courthouse 50 Walnut Street, Room 2C Newark, NJ 07101

Re: Alexander Braurman v. United Collection Bureau, Inc. Civil Action No. 2:11-cv-00599-SRC-MAS

Dear Judge Shipp:

We represent the defendant, United Collection Bureau, Inc. ("UCB"), in reference to the above-captioned matter. Currently, UCB's answer or motion to the Amended Complaint is due on March 16, 2011. However, the plaintiff intends to file a Second Amended Complaint. As such, rather than address the current complaint, the parties have agreed to permit the plaintiff to file a Second Amended Complaint on or before March 31, 2011, and for the defendant, UCB, additional time to answer or otherwise move to the Second Amended Complaint by April 21, 2011.

A proposed Stipulation and Order is being filed electronically with this letter for Your Honor's consideration.

Respectfully submitted,

VÍRGÍNIA A. PALLOTTO

VAP: da/849678 Enclosure as stated

cc: Philip D. Stern, Esq. (w/ enc. via e-mail)

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